

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BODYGUARD PRODUCTIONS,
INC., et al.,

Plaintiffs,

vs.

RCN TELECOM SERVICES OF
MASSACHUSETTS, LLC and RCN
TELECOM SERVICES, LLC,

Defendants.

No. 3:21-cv-15310-GC-TJB

**CERTIFICATION OF EDWARD F.
BEHM, JR. IN SUPPORT OF
MOTION TO ADMIT KYLE G.
GOTTUSO *PRO HAC VICE***

I, EDWARD F. BEHM, JR., of full age, certify as follows:

1. I am an attorney-at-law admitted to practice in the State of New Jersey and am local counsel for Defendants in this action. I am a member in good standing of the Bar of the State of New Jersey. I am a member of the law firm of Armstrong Teasdale LLP, attorneys for Defendants RCN Telecom Services of Massachusetts, LLC and RCN Telecom Services, LLC (collectively, “RCN Defendants”) in the above-captioned matter. I submit this Certification in support of RCN Defendants’ Motion to Admit Kyle G. Gottuso as attorney for the Defendants as counsel *pro hac vice* pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Certification. I will be associated with Mr. Gottuso in the handling of this matter in accordance with Local Rule 101.1(b).

2. If the Court grants the above-referenced Motion for *pro hac vice* admission, I will continue to serve as local counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorney admitted *pro hac vice*, and will otherwise comply with all the terms and conditions of *Local Civil Rule 101.1(c)*.

3. The RCN Defendants have specifically requested that Kyle G. Gottuso represent it in this action.

4. To the best of my knowledge, Mr. Gottuso is a member in good standing with the Bar of the State of Delaware.

5. To the best of my knowledge, Kyle G. Gottuso has never been under any suspension or disbarment by the Bar of any Court, and there are no disciplinary proceedings pending against him.

6. To the best of my knowledge, Kyle G. Gottuso is aware that while admitted *pro hac vice* in this matter he is under the disciplinary jurisdiction of this Court.

7. There is good cause for the *pro hac vice* admission of Kyle G. Gottuso, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of these proceeding would be occasioned by having him acting as attorney for RCN Defendants in this matter.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ *Edward F. Behm, Jr.*
Edward F. Behm, Jr.

Dated: February 6, 2023